

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtor.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM APPEARANCE AT OMNIBUS HEARING SCHEDULED
FOR APRIL 28-29, 2021**

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that, pursuant to this Court's *Order Regarding Procedures for April 28-29, 2021 Omnibus Hearing* [Dkt. No. 16475], counsel for Unión de Trabajadores de la Industria Eléctrica y Riego Inc. ("UTIER") and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica ("SREAEE") hereby respectfully state as follows:

1. Jessica E. Méndez Colberg and Rolando Emmanuelli Jiménez of Bufete Emmanuelli, C.S.P., will appear on behalf of UTIER and SREAEE on April 28, 2021, Omnibus Hearing ("Hearing") via telephonic appearance through the CourtSolutions link, and, to the extent necessary, present argument.

2. Counsels for UTIER and SREAEE will particularly address all matters related to:
- a. UTIER's Objection to the Government Parties' Motion For Order Allowing Administrative Expense Claim for Amounts to be Paid to Luma Energy by

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PREPA During Interim Period under Supplemental Agreement and the T&D Contract [Dkt. No. 2435].

- b. SREAEE's Objection to the Government Parties' Motion For Order Allowing Administrative Expense Claim for Amounts to be Paid to Luma Energy by PREPA During Interim Period under Supplemental Agreement and the T&D Contract [Dkt. No. 2437].

3. Because the Agenda for the Hearing has not yet been filed, UTIER and SREAEE reserve the right to present an argument at the Hearing concerning any of the matters outlined in the Agenda that may impact UTIER's and SREAEE's rights.

4. In the event, there is a matter included in the Agenda that requires argument from UTIER and/or SREAEE, an amended motion will be filed consistent with the Hearing Procedures Order.

5. Counsel will be prepared to respond to any matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

WHEREFORE, UTIER and SREAEE respectfully request that the Court take notice of the above stated.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in *First Amended Standing Order*.

In Ponce, Puerto Rico, this 22th day of April 2021.



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